United States Environmental Protection Agency
Region 4
Pollution Report
(PolRep)

I. HEADING

Date: June 28, 2003

Subject: Tennessee Gas Pipeline Project - Removal Action
Compressor Station 114, Catlettsburg, KY
(Group 5 - Covered Station)

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POLREP: **No. 2 (Final)**

II. BACKGROUND

Site Number:	XS
CERCLIS Number:	TN000981977
NPL Status:	N/A
Response Authority:	CERCLA
Action Memorandum Status:	Approved on April 22, 2003
State Notification:	Yes - KYDEP
Start Date:	June 4, 2003
Demobilization Date:	June 28, 2003
Completion Date:	June 28, 2003

III. SITE INFORMATION

A. Incident Category: Non-Time Critical Removal Action.
Voluntary PRP Lead Pursuant to an AOC.
Active Facility (natural gas compressor station)

B. Site Description:

1. Site Location:

Compressor Station 114 is located in Boyd County along Hwy 123, approximately 10 miles south of the Catlettsburg, KY. The station occupies approximately 38 acres and is surronded by forested hillsides and the Big Sandy River. Site elevation 560 feet above mean sea level.

2. Description of Threat:

From the mid 1950s until the early 1970s, PCBs were released into the environment due to normal maintenance performed by station employees. This practice involved the release of condensate from Air Storage Tanks containing pressurized air used to start the station's compressor engines and to power tools . The source of the PCBs were from the lubricant used in the air compressors. Pydraul, the lubricant, was formulated with PCBs for its flame retardant properties. The condensate was either released directly to the soil beneath the Air Receiver Tanks or piped to the station's storm water drainage system. The potential threat from PCB contaminated surface soils is to on-site workers.

C. Preliminary Assessment / Site Inspection:

The preliminary assessment review consisted of reviewing TGPL's Site Characterization Reports, Supplemental Characterization Reports and site inspections by the OSC. The result of this review indicates the majority of the PCB soil contamination is located in several small areas near the air receiver tanks and in two station drainage areas within and outside of the station fence. An estimated 782 cubic yards of contaminated surface soil is targeted for remediation which will be excavated and transported to an EPA approved off-site disposal facility.

IV. Response Information

A. Situation

1. Current Situation:

TGPL's remediation contractor mobilized personnel and equipment to the site on June 4, 2003.

Weather:	Clear and cool (60-85degrees)
Personnel:	14 Shaw E & I, Inc. remediation contractors (site engineer, site supervisor, site safety officer, equipment operators, environmental technicians, etc.).
Equipment:	Backhoe/loader,LGP Bulldozer,Excavator, Bobcat Excavator, John

Deere loader, L90 Loader, Water Truck, mini-excavator, Pickup trucks (3), Cars(2), Trailers (3 - field office, tools, and equipment storage), and three Porta-toilets strategically located about the site.

2. Removal Activities to Date (prior to this Removal Action):

This is the first removal activity pursuant to the AOC and EPA approved Remediation Site Work Plan (RSWP) for Compressor Station 114.

3. Enforcement:

All removal activities are being conducted pursuant to an AOC between TGPL and EPA Region 4 signed on August 9, 1994.

B. **Planned** and **Completed** Removal Activities:

Planned Activities (as of June 4, 2003)

The following "planned" remediation activities will be conducted by the PRP's remediation contractor over the next 15-20 days. All removal activities will be implemented as per the EPA approved Remediation Site Work Plan (RSWP).

Soil Removal: PCB contaminated soil is targeted for remediation (excavation) in several locations within and outside of the fenced area of the compressor station. Areas targeted for remediation include: (1) areas adjacent to Air Receiver Tanks A and B, Compressor Building A, and Drainage Areas A and B. All excavated areas will be back filled with clean soil, returned to original grade and covered either with vegetation or with rip-rap rock for erosion control purposes. The remediation contractor will also conduct drainage improvements within and around the surface drainage areas. An estimated 782 cubic yards (1,100 tons) of soil targeted for remediation.

Stormwater Drain Lines and Manholes: Storm water drainlines and manholes that may have come in contact with PCBs will be inspected, plugged and abandoned in place pursuant TGPL's Water Management Program.

Low Contact Building Surface Remediation: Targeted areas will be washed with an industrial strength cleaning solution, rinsed and dried. After drying, verification wipe samples will be collected and shipped to a laboratory for analysis. If test results indicate the areas cleaned are below the cleanup level, no further action is required. If not and depending on the level of PCBs from the test results, the areas will be re-cleaned and re-sampled or the areas will be coated with an industrial grade sealant (paint).

Completed Activities: (as of June 28, 2003)

All **planned** activities (as noted above) were completed on June 28, 2003. El Paso's remediation contractor (Shaw E & I) completed all task pursuant to the EPA and KYDEP approved Remediation Site Work Plan.

Approximately 1,152 tons of contaminated soil (PCBs) were excavated from various areas of the site and transported to EPA approved off-site disposal facilities (Subtitle C and D). A total of 678 tons of soil was transported to the Subtitle "C" Landfill in Model City, New York while an additional 474 tons of soil was transported to the Subtitle "D" Green Valley Landfill in Ashland, KY.

All excavated areas were backfilled with clean soil and then covered with either Geotextile fabric and Rip-Rap rock or grass sod for erosion control purposes.

A total of 587 square feet of surface area (floor) were cleaned in the basement of Auxiliary Building B. Fifteen verification wipe samples were collected from the cleaned area and shipped to an off-facility laboratory for analysis. Tests results for all verification samples were less than the cleanup level (500 ug/100sq.cm), therefore no additional cleaning was required.

Inspection of drainlines and manholes was performed and all inlets, manholes, and outlets had been previously plugged, therefore, no additional action was required.

A Final Site Report will be prepared and sent to EPA/KYDEP for review within 90 days of completion of on-site work.

C. Next Steps:

Within 90 days of completion of remediation activities, the PRP is scheduled to submit a Final Site Report (FSR) to EPA for review and approval pursuant to requirements in the AOC.

D. Key Issues: None.

V. Cost Information

All cost of the removal action, including EPA's oversight, is being funded by the PRP, (Tennessee Gas Pipeline Company). The estimated cost of implementing the EPA approved RSWP at Compressor Station 114 was **$ 591,400.00**.

VI. Disposition of Wastes

A total of 1,152 tons of contaminated soil and debris were transported to EPA approved disposal facilities for final disposal (i.e. 678 tons to Chemical Waste Mgt., Model City Facility, Model City, NY, Subtitle C and 474 tons to Green Valley Landfill, Ashland, KY, Subtitle D). The off-site disposal facilities were evaluated and determined to be acceptable to receive CERCLA waste as per EPA Region 2 and 4's Regional Off-Site Disposal Coordinators.

VII. EPA Disclaimer

Please be advised that statements within this document concerning the status of response activities are intended solely for use by employees of the US Environmental Protection Agency for management of the Superfund Removal Program and are not intended for use in calculating cost recovery statute of limitations. Moreover, the EPA may continue to evaluate this site to determine the necessity of additional response if such is warranted.